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Attorneys for the Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE ASSOCIATED PRESS,

Plaintiff,

v.

MELTWATER U.S. HOLDINGS, INC.;
MELTWATER NEWS U.S., INC.; and
MELTWATER NEWS U.S. 1, INC.,

Defendants.

CASE NO.: 2:12-CV-01087-DLC-FM
ECF CASE

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law in Support of Defendants' Motion for Summary Judgment; (ii) Defendants' Local Rule 56.1 Statement of Material Facts As To Which There Is No Genuine Issue To Be Tried; (iii) the Declaration of Catherine Grealis, dated November 9, 2012, and the exhibits attached thereto; (iv) the Declaration of Robert A. Glunt, dated November 9, 2012, and the exhibits attached thereto; (v) the Declaration of

Sara Saab, dated November 7, 2012, and the exhibits attached thereto; (vi) the Declaration of John Box, dated November 6, 2012, and the exhibits attached thereto; (vii) the Declaration of Cathy Lawhon dated October 1, 2012, and the exhibit attached thereto; (viii) the Declaration of Nick Fuller dated November 7, 2012, (ix) the Declaration of Brock N. Meeks dated October 15, 2012; and (x) all papers and pleadings previously filed herein;

Defendants Meltwater US Holdings Inc., Meltwater News US Inc., and Meltwater News US1 Inc. ("Defendants"), by their undersigned counsel, will and hereby do move this Court, before the Honorable Denise L. Cote, United States District Judge, at the United States District Court, 500 Pearl Street, New York, New York, on a date and time to be designated by the Court, for an Order, pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, that (i) Defendants are entitled to summary judgment on the claims asserted in the Amended Complaint filed by The Associated Press ("AP") on July 13, 2012 for Copyright Infringement (First Cause of Action), Contributory Copyright Infringement (Second Cause of Action), Vicarious Copyright Infringement (Third Cause of Action), and Declaratory Judgment (Fourth Causes of Action); and (ii) granting Defendants such other and further relief as this Court deems just and proper.

Respectfully submitted,

Dated: November 9, 2012

WILSON SONSINI GOODRICH & ROSATI
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By: 

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